

EXHIBIT 24



A	B	C	D	E	F	G	H	I	J	K
1	<p align="center">Commitment to Customer Program</p> <p align="center">Risk & Materiality Assessment Template</p>									
2	<p>Instructions: The purpose of the Risk and Materiality Assessment is to assist in the determination of whether the issue qualifies as a Commitment to Customer Issue, recognizing that this Policy and the Corporate Program in general are not intended to address issues of a de minimis nature. The Steering Committee will establish Commitment to Customer Issue risk and materiality thresholds. On at least an annual basis, these thresholds will be reviewed and subject to adjustment, as appropriate. This template may be used to perform omissions testing. Completion of section A will assist in the determining if the issue at hand qualifies as a C2C issue. The user will be prompted to complete the risk and materiality sections (B-F), as necessary. Attributes marked with an asterisk and answered affirmatively require timely notification be provided to the CFPE.</p> <p>Note that this assessment methodology will be approved by the Commitment to Customer Steering Committee.</p>									
3	<p align="center">Risk & Materiality Assessment</p>									
4	#	Assessment Attribute	Attribute Type	Attribute Sub-Type	Risk Type	Response	Risk Level Score	Weight per Question	Response Description (Required)	Supporting Documentation
5	A. Qualified C2C Issue Definition									
6	1	Does the issue appear to have an actual or perceived negative impact on affected consumers (i.e. an individual, including an individual with a Representative, who maintains, is offered, or applies for a financial product or service from Wells Fargo for personal, family, or household purposes), or applicants or customers who are governed by the jurisdiction of the CFPB through the Enumerated Consumer Financial Laws?	Definition	-	N/A	Yes	Continue to Next Question	N/A	<p>A examination was initiated to review customers who were denied a loan modification due to the process used to estimate attorney fees.</p> <p>The Home Preservation Application (HPA) tool used by the Wells Owned, Bank and Private, FNMA, FHLMC and VA portfolios was placed into production April 13, 2010 with logic to utilize a State Fee Matrix that provided maximum allowable foreclosure attorney fees and costs.**As of 3/20/2018, it was determined that VA is out of scope as they did not utilize the state fee matrix.</p> <p>The HPA tool was automated to pull in attorney fees that were paid at the time of the decision from MSP screen (DDCH) and added them to the maximum allowable from a state matrix.</p> <p>Potential Impact to the customer: This practice potentially over stated the dollar amount for recoverable fees that were incurred at the time of the decision, which could have created an HTI impact making the payment unaffordable and potentially declining for either affordability and/or NPV.</p> <p>The fee matrix usage was eliminated from the HPA tool on 10/20/2015.</p>	
7	2	Does the issue appear to require historical remediation related to past events?	Definition	-	N/A	Yes	Continue to Next Question	N/A	Yes. The State Fee Matrix was utilized within the HPA tool from April 13, 2010 through October 20, 2015.	
8	3	Does the issue appear to be systemic in nature (i.e., affecting multiple consumers due to one or more common root causes)?	Definition	-	N/A	Yes	Continue to Next Question	N/A	Yes, multiple consumers have been impacted by this issue.	
9	4	Does the issue appear to be within the control of Wells Fargo or parties under Wells Fargo's control (for example, third-party service providers)?	Definition	-	N/A	Yes	C2C Issue - Complete Sections B-F	N/A	Yes, this issue is within the control of Wells Fargo.	
10	B. Materiality Assessment									
11	1	Does the issue appear to affect more than XXX accounts? Use the Risk and Materiality Thresholds listed for your business below.	Materiality	-	Operational Risk	No	Continue to Next Question	N/A	Validated by Wells Fargo Audit Services (WFAS) and RECOR Data Validation Team (DVT).	
12	2	Does the issue involve potential remediation equal to or greater than \$XXXXXX in total? Use the Risk and Materiality Thresholds listed for your business below.	Materiality	-	Financial Risk	No	Continue to Risk Assessment	N/A	Remediation amount is below threshold.	
13		Business Group	Dollar Threshold (millions)	Account Threshold (thousands)						



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14		Community Banking Group (CBG)		\$ 1.5	25.0						
15		Consumer Lending Group (CLG) Real Estate Lending (RE) Consumer Credit Solutions (CCS) Dealer Services (DS)		\$ 10.0 \$ 5.0 \$ 5.0	50.0 25.0 25.0						
16		Wealth Brokerage and Retirement (WBR)		\$ 5.0	5.0						
17		Wholesale (WHSL)		\$ 5.0	25.0						
18	C. Risk Assessment - Identification Source										
19	1	Was the issue identified through a regulatory examination, inquiry and/or complaint?*	The inquiry or complaint would also have come from a regulator, not through standard internal processes.	Risk	Identification Source	Regulatory Risk	No	0	3	No, the issue was not identified through a regulatory examination, inquiry or complaint. The issue was discovered while an assessment was taking place for a separate issue within Settlement.	
20	2	Was the issue identified by a third-party business partner and/or government-sponsored entity (GSE) with which and/or to whom Wells provides services (e.g., mortgage loan servicing, joint marketing, etc.)?		Risk	Identification Source	Third-Party Risk	No	0	1	No, the issue was not identified by a third party business provider or a GSE.	
21	3	Was the issue identified by a third-party service provider?		Risk	Identification Source	Third-Party Risk	No	0	1	No, the issue was not identified by a third party service provider.	
22	4	Was the issue identified through a high-profile channel (e.g., news media, social media, etc.)?		Risk	Identification Source	Reputational Risk	No	0	1	No, the issue was not identified through a high-profile channel.	
23	5	Was the issue identified through a consumer lawsuit and/or other legal action?*		Risk	Identification Source	Legal Risk	No	0	3	No, the issue was not identified through a consumer lawsuit or other legal action.	
24	6	Was a similar issue identified in regulatory action taken against another institution?*	Answer yes if our remediation is driven in whole or in part by the action taken at the other institution.	Risk	Identification Source	Regulatory Risk, Legal Risk	No	0	3	No, we are not aware of a similar issue being identified against another financial institution.	
25	D. Risk Assessment - Affected Population										
26	1	Does the issue appear to affect high-risk consumers, protected classes, or vulnerable populations (e.g., service members, loss mitigation/workout mortgage borrowers, foreclosures, etc.), or does the issue appear to involve potential discrimination and/or pose potential Fair Lending-related risks?*	Answer yes if the nature of the issue uniquely or disproportionately impacts high risk consumers.	Risk	Affected Population	Reputational Risk	Yes	3	3	Yes, this issue impacts Loss Mitigation and Foreclosure loans.	
27	2	Does the issue appear to affect consumers nation-wide (and/or globally)?		Risk	Affected Population	N/A	Yes	1	1	Yes, this issue does affect consumers nation-wide.	
28	3	Does the issue appear to affect consumers across multiple products?		Risk	Affected Population	N/A	No	0	1	No, the issue is limited to Home Lending Loss Mitigation products.	

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4	#	Assessment Attribute		Attribute Type	Attribute Sub-Type	Risk Type	Response	Risk Level Score	Weight per Question	Response Description (Required)	Supporting Documentation
29	4	Does the issue appear to affect consumers across multiple lines of businesses (LOBs) and/or service delivery channels?	To cross LOB's, the issue must extend beyond Home Lending.	Risk	Affected Population	N/A	No	0	1	No, the issue is limited to Home Lending.	
30		E. Risk Assessment - Nature of Issue									
31	1	Does the issue appear to be a repeat issue?	Repeat issue means that the same issue has occurred despite corrective action to prevent and NEW	Risk	Nature of Issue	Operational Risk	No	N/A	N/A	No, this is not a repeat issue.	
32	2	Does the issue appear to be attributable (in whole or part) to a third-party service provider?	Respond yes if an error by a third party was a driver for the remediation. There are no high risk products identified by Home Lending. If the issue relates to modifications, services, or other aspects of the	Risk	Nature of Issue	Third-Party Risk	No	0	1	No, the issue is not attributable to a 3rd party service provider.	
33	3	Does the issue appear to be related to a high-risk product or service (e.g., credit card add-on product, mortgage loan modification, special services credit account, etc.)?	Respond yes if the issue relates to modifications, services, or other aspects of the	Risk	Nature of Issue	Reputational Risk, Regulatory Risk	No	0	3	There are no high risk products identified by Home Lending.	
34	4	Does the issue appear to involve potential privacy and/or information security-related risks?		Risk	Nature of Issue	Regulatory Risk	No	0	1	No, the issue does not appear to involve privacy and/or information security related risks.	
35	5	Does the issue appear to involve potential non-compliance with consumer protection laws or regulations, including those enumerated consumer financial laws applicable to the business?*	Only Law Department can state that a violation has occurred. LOB may respond No if there are clearly no compliance aspects of the issue after consulting with RECOR.	Risk	Nature of Issue	Regulatory Risk	Yes	3	3	[Redacted - WP & ACP]	
36	6	Does the issue appear to involve potential non-compliance with consumer protection laws or regulations, including those enumerated consumer financial laws applicable to the business?*	Partner with Investor Services or Agency Relations if a violation is suspected.	Risk	Nature of Issue	Third-Party Risk, Legal Risk	Yes	1	1	[Redacted - WP & ACP]	
37	7	Does the issue appear to involve potential non-compliance with consumer protection laws or regulations, including those enumerated consumer financial laws applicable to the business?*	Answer yes if the error cannot be cured due to missed timing or other factor that cannot be corrected after the fact.	Risk	Nature of Issue	Operational Risk	No	0	2	[Redacted - WP & ACP]	
38	8	Does the issue appear to pose potential serious reputation risk to the Bank?	Consider Rep Risk questions C4, D1, and E3. If those are Yes, then Sponsor should consider identifying as serious risk.	Risk	Nature of Issue	Reputational Risk	No	N/A	N/A	No serious reputational risk.	
39		F. Risk Assessment - Corrective Action and Remediation									
								4.00	11.00		

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40	1	Are there any known record retention, data integrity or other operational challenges associated with obtaining data and calculating potential financial restitution?*		Risk	Corrective Action and Remediation	Financial Risk, Operational Risk	No	0	3	No record retention or data integrity challenges.		
41	2	Does the issue involve potential corrective action that may require an extended period of time to complete (with or without a feasible interim solution)?*	This should consider your final corrective action, not long-term efficiency enhancements that are release dependent.	Risk	Corrective Action and Remediation	Operational Risk	No	0	3	No, the state fee matrix is no longer in use.		
42	G. Conclusion							0.00	6.00			
43								8.00	35.00			
44	1 -- Is this a C2C Issue?		Yes									
45	2 - Assessed Materiality Level		Low									
46	3 - Assessed Risk Level		Low									
47	4- Is this Issue subject to Governance Working Group acceptance?		No									
48	5 - Notify CFPE?*		Yes									
49	Legend						Executed By	Cathy Gutierrez / Jason DePino				
50	Risk Level		Risk				Date	4/5/18				
51	High		20-35				LOB Approver	Brian Spensley				
52	Moderate		10-19				Date	4/11/18				
53	Low		≤9				RECOP Approver	Brian Dietz				
54							Date	4/18/18				
55												
56	Interested Parties Included:											
57	Name	Functional Title	Email	Participated Y/N								
58												
59	Spensley, Brian	LoB Approver	Brian.A.Spensley@wellsfargo.com									
60	Thompson, Jill	Lending Officer, Default Underwriting Escalation Team - Primary Business Contact	jillthompson@wellsfargo.com	Y								
61	Archer, Kari L.	Business Support Consultant, Default Underwriting Escalation Team	Kari.L.Archer@wellsfargo.com	Y								
62	Gutierrez, Cathy	Default Customer Impact Resolution (DCIR) Incident Owner	cathy.gutierrez@wellsfargo.com	Y								
63	Depino, Jason A.	Default Customer Impact Resolution (DCIR) Incident Owner	Jason.A.Depino@wellsfargo.com	Y								
64	Rodriguez, Ruby	Servicing Operational Risk Management - CIT Analyst	ruby.rodriguez@wellsfargo.com	Y								

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65		Alvarez, Adam	Customer Excellence Data Analytics (CEDA)	adam.alvarez@wellsfargo.com		Y					
66		Bothwell, Katherine M.	RECOR	Katherine.M.Bothwell@wellsfargo.com							
67		Camp, James	Operational Risk Consultant, Settlement	james.t.camp@wellsfargo.com		Y					
68		Cannady, Annette	Customer Service	Annette.Cannady@wellsfargo.com							
69		Cortese, Ralph V.	RECOR WFHL FCRA Program Compliance Manager	Ralph.V.Cortese@wellsfargo.com							
70		Drzewiecki, Kathleen	Business Support Consultant, BK	kathleen.m.drzewiecki@wellsfargo.com							
71		Edwardson, Jessica M.	Operational Risk Consultant, Settlement	jessica.m.edwardson@wellsfargo.com		Y					
72		Giroux, Chelsea	Foreclosure	chelsea.giroux@wellsfargo.com							
73		Good, Todd	Customer Care and Recovery Group (CCRG)	todd.a.good@wellsfargo.com							
74		Graves, Darla J.	Investor Reporting FHLMC	Darla.J.Graves@wellsfargo.com							
75		Guttry, Tammy	Operational Risk Consultant, CAMO	Tammy.A.Guttry@wellsfargo.com							
76		Hohenstern, Kimberly	Customer Service	kimberly.hohenstern@wellsfargo.com							
77		Hutzell, Travis	Customer Excellence Data Analytics (CFDA)	travis.hutzell@wellsfargo.com		Y					
78		Johnson, Lynne	MHA Operation Reporting	lynne.m.johnson@wellsfargo.com							
79		Johnson, Tonya	Paralegal	tonya.johnson2@wellsfargo.com							
80		Kohls, Bob	Legal	bobkohls@wellsfargo.com							
81		Ossian, Brandv	Finance	brandv.ossian@wellsfargo.com							
82		Parker, Linda G	ORC Credit Bureau Reporting	LINDA.G.PARKER@wellsfargo.com							
83		Rivera, Ramon	Home Preservation Specialists (HPS)	ramon.rivera@wellsfargo.com							
84		Rodriguez, Ruby	CIT Analyst	rubyv.rodriquez@wellsfargo.com		Y					
85		Simpson, Roger	ORC Credit Bureau Reporting	roger.simpson@wellsfargo.com							
86		Solis, Gerry	Customer Service	gerry.solis@wellsfargo.com							
87		Vaske, Lori	COE Communications	lori.vaske@wellsfargo.com							
88		Williams, Julie T.	Customer Service	julie.williams@wellsfargo.com		Y					
89		Nicole Nichols				Y					
90		Jeff Liggett				Y					